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REGULATORY AUTH.
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October 18, 2000
EXECUTIVE SECRETARY

Guy M. Hicks
General Counsel

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VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-355 and
Riser Cable and Terminating Wire as Ordered in TRA Docket No. 98-00123*
Docket No. 00-00544

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth's Objections to Covad's Second Interrogatories and Second Request for Production of Documents. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-18
355 and Riser Cable and Terminating Wire as Ordered in TRA Docket No.
98-00123*

Docket No. 00-00544

**BELLSOUTH'S OBJECTIONS TO COVAD'S
SECOND INTERROGATORIES AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth") files its objections to Covad's Second Interrogatories and Second Request for Production of Documents as follows:

General Objections

1. BellSouth objects to each and every one of Covad's Second Interrogatories and Second Request for Production because they exceed the number of discovery requests permitted under the Tennessee Rules of Procedure § 1220-1-2-.11(5)(a) (limiting discovery requests to forty, absent a showing of good cause). Through its first set of discovery to BellSouth, Covad has already propounded forty-one discovery requests (thirty-four interrogatories and seven requests for production) upon BellSouth and BellSouth has provided a response to each of these requests.

2. BellSouth objects to the definitions and instructions to the extent they seek to impose any obligation upon BellSouth which exceeds the obligations established by the rules of civil procedure or by the Commission.

3. BellSouth objects to the definition of "BellSouth" as overly broad. BellSouth will respond to these requests on behalf of those entities for whom BellSouth is legally required to respond.

Specific Objections

In addition to and without waiving the General Objections set forth above, BellSouth sets for the following specific objections to certain of the individual discovery request.

REQUEST NO. 15: In 1999, how many service orders for BellSouth's retail services in Tennessee (i.e., non-UNEs or resale facilities) required conditioning activities to provision?

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 16: How many BellSouth service orders pertaining to BellSouth's retail service does BellSouth anticipate will require conditioning activities? Please provide this information for the following timeframes: 2000, 2001, and 2002.

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 17: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 18: Please provide the total number of ISDN-PRI circuits sold by BellSouth in Tennessee in 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date)

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further

objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 19: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 20: Please provide the total number of ISDN-BRI circuits sold by BellSouth in Tennessee in 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date).

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 21: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 22: Please provide the total number of T-1 or DS-1 circuits sold by BellSouth in Tennessee in 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date).

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 23: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 24: Please provide the total number of digital circuits below T-1 capacity (e.g., 64 kbps, 56 kbps, etc.) sold by BellSouth in Tennessee in 1992, 1993, 1994, 1994, 1995, 1996, 1997, 1998, 1999, 2000 (year to date).

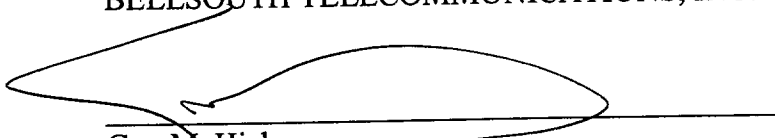
OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

REQUEST NO. 25: Please provide the number of these circuits whereby a service order was issued for purposes of undertaking conditioning activities.

OBJECTION: BellSouth objects to this request on the grounds that it is overly broad and unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. BellSouth further objects to this request on the grounds that it seeks information which is not relevant to any of the issues pending in this docket.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A large, stylized handwritten signature in black ink, appearing to read 'Guy M. Hicks', is written over a horizontal line.

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CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

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